

# United States District Court

for the  
Western District of New York

**United States of America**

**v.**

**Case No. 23-mj- 4143**  
**(Filed Under Seal)**

**DAWNN MARIE WALTERS**

*Defendant*

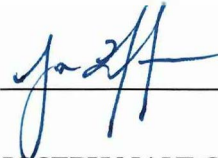
## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of August 12, 2023, in the County of Monroe, in the Western District of New York, the defendant did knowingly and unlawfully violate Title 18 United States Code, Sections 1030(a)(2)(C) and (c)(2)(B)(ii) (unauthorized access of a protected computer in furtherance of any criminal act in violation of the laws of the United States) and 371 (Conspiracy to commit offense).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



*Complainant's signature*

JOSEPH NAYLOR  
SPECIAL AGENT  
Federal Bureau of Investigations

*Printed name and title*

Sworn to telephonically and signed electronically

Date: November 3, 2023



*Judge's signature*

City and State: Rochester, New York

HONORABLE MARIAN W. PAYSON  
UNITED STATES MAGISTRATE JUDGE

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

STATE OF NEW YORK     )  
COUNTY OF ERIE        )     SS:  
CITY OF BUFFALO        )

I, Joseph Naylor, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint charging **DAWNN MARIE WALTERS** (hereinafter “DAWNN WALTERS”), with violations of Title 18, United States Code, Sections 1030(a)(2)(C) (unauthorized access of a protected computer in furtherance of any criminal act in violation of the laws of the United States) and 371 (Conspiracy to commit offense).

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since July 2022. I am currently assigned to the Cyber Squad, Buffalo Division, in Buffalo, New York, where I work on investigations relating to criminal and national security cyber intrusions. I received my Bachelor’s in Finance and my Master’s in Information Systems. Prior to becoming an FBI Special Agent, I worked in the private sector, including working in the cybersecurity, information technology and the financial sectors. As a Special Agent with the FBI, I am empowered by law to investigate and make arrests for offenses against the United States.

3. The facts set forth are based upon my personal observations, my training and experience, and information obtained during the course of the investigation from other members of law enforcement, involving the review of records, interviews of subjects and witnesses, and information and reports provided. Because this affidavit is submitted for the purpose of establishing probable cause to support the issuance of a Criminal Complaint and Arrest Warrant, I have not included each and every fact known by the government for this investigation.

4. The facts set forth are based upon my personal observations, my training and experience, and information obtained during the course of the investigation from other members of law enforcement, involving the review of records, interviews of witnesses, and information and reports provided. Because this affidavit is submitted for the purpose of establishing probable cause to support the issuance of a Criminal Complaint and Arrest Warrant, I have not included each and every fact known by the government for this investigation.

#### **PROBABLE CAUSE**

5. On August 31, 2023, the Orleans County (“NY”) Sheriff’s Office contacted the Federal Bureau of Investigation’s Buffalo Field Office (“FBI Buffalo”) to seek assistance in a local swatting call investigation. Swatting is where someone makes a false report of a serious

crime, such as a hostage situation or active shooter, in order to send a SWAT<sup>1</sup> team or law enforcement response to a targeted location.

6. The Orleans County Sheriff Investigator told FBI Buffalo that on August 9, 2023, unknown subject(s) (“UNSUB(s)”) started a 988 Suicide and Crisis Lifeline Chat on the Volunteers of America Crisis Response Services website. UNSUB(s) identified themselves as Cassidy Felerski (“FELERSKI”), stated they had shot someone and provided their address as POSTAL ADDRESS 1. POSTAL ADDRESS 1 was FELERSKI’s parents’ address.

7. On September 5, 2023, the Orleans County Sheriff Investigator requested FBI Buffalo assistance with downloading a video from X (formerly Twitter). That video was the screen-recording of a Discord chat room in which the Discord user “okswtzv2” discussed swatting with other room participants and posted screenshots of an X conversation between the X username @skidtaunter (display name “okswtz”) and another X user.

8. FBI Special Agents queried the Internet Crime Complaint Center (“IC3”) database for the X username @skidtaunter and found an IC3 Complaint submitted by FELERSKI’s boyfriend, Payton Walters. On August 25, 2023, Payton Walters reported to

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<sup>1</sup> SWAT: Special Weapons and Tactics, is a specialized law enforcement team that is brought in to address high-risk situations, such as hostage rescue.

IC3 that a group of people, including the screen name @skidtaunter, had doxxed<sup>2</sup> FELERSKI and swatted FELERSKI's parents' house thinking that was where FELERSKI was located. The IC3 Complaint further stated that FELERSKI owned the X account @AkumaMikoVT and Payton Walters owned the X account @NiikoTsuVT. This investigation revealed that following this IC3 complaint, FELERSKI and Payton Walters have since separated.

9. Open source research located the X profile for @skidtaunter (display name "okswtz"). This X profile contained reference to FELERSKI, specifically, the profile description read "15 years old // Cassidy aka AkumaMikoVT is a lying Marxist. (currently asleep)." The X profile description also included a hyperlink to a Discord Server.

10. On September 6, 2023, X user @skidtaunter referenced FELERSKI by posting "I don't think Akuma really cares though since I might still have access to one of her emails, cassfelersk2000@gmail.com but she hasn't tried getting it back". Cassfelersk2000@gmail.com is FELERSKI's personal email address. Based on my investigation of this case, AKUMA is short for AkumaMikoVT which is the online persona of FELERSKI.

11. On September 6, 2023, X user @skidtaunter again referenced FELERSKI, this time using her real name, when they posted "well yeah I also have access to cassidys email

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<sup>2</sup> Doxxed: To search for and publish private or identifying information about (a particular individual) on the internet typically with malicious intent.

too :3” and later “we don’t lie here at okswtz industries” with a screenshot of what appeared to be the Google Account for FELERSKI’s personal email, cassfelersk2000@gmail.com. @Skidtaunter reference to having access to FELERSKI’s personal email account was corroborated through evidence recovered from Discord.

12. On September 5, 2023, WITNESS 1, an individual known to the government that was also doxxed by okswtz, submitted an IC3 complaint about okswtz. FBI Special Agents telephonically interviewed WITNESS 1 on September 18, 2023. During the interview, WITNESS 1 offered to provide the FBI with the screenshots and videos of incriminating Discord conversations from “AKUMA SHAKER CENTRAL [FASCIST LAND]” wherein the participants discussed harassing FELERSKI. Notably, FELERSKI’s online persona is “Akuma Miko” and the Discord server name “AKUMA SHAKER CENTRAL [FASCIST LAND]” is likely a reference to FELERSKI. WITNESS 1 told FBI Agents in a later interview that WITNESS 1 had found the invite link to the Discord Server “AKUMA SHAKER CENTRAL [FASCIST LAND]” on okswtz’s X profile.

13. Review of a video screen-recording provided by WITNESS 1 showed conversations occurring within the Discord Server “AKUMA SHAKER CENTRAL [FASCIST LAND]”. In one such conversation, a Discord user named “esexually” asked another Discord user named “MamaDawnn” “Is your pfp really you.” MamaDawnn responded “Yeah. I don’t have anything to hide.” Based on my training and experience, “pfp” is short for profile picture, or the picture accompanying the username. Discord User

MamaDawnn later stated her age as being 52. In a later conversation with esexually, MamaDawnn stated, “I’m Payton’s mom.” The government reviewed the profile picture for Discord user MamaDawnn and open source research confirmed this was a picture of DAWNN WALTERS, the mother of FELERSKI’s ex-boyfriend Payton Walters.

14. As referenced in Paragraph 8 above, FELERSKI previously dated Payton Walters. Open source research found that Payton Walters’ mother is DAWNN WALTERS of Rochester, New York, age 52. Dawnn Walters’ LinkedIn profile pictured a woman with the same likeness as the profile picture for Discord User MamaDawnn. Accordingly, I believe that MamaDawnn is DAWNN WALTERS.

15. The video and screenshot recordings of the “AKUMA SHAKER CENTRAL [FASCIST LAND]” Discord server also contained conversations between MamaDawnn and a Discord user named rebirthofokswtz (display name “okswtzv2”) wherein they discussed FELERSKI.

16. Specifically, in one such conversation, okswtzv2 posted “FOUND ONE OF CASSIDYS DEVICES” with a screenshot of a Google account recovery website using the two-factor authentication<sup>3</sup> phone number of (505) 365-9150. This phone number is associated

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<sup>3</sup> Two-factor authentication is an electronic authentication method in which a user is granted access to a website or application only after successfully presenting two or more pieces of evidence to an authentication mechanism.

with FELERSKI and is attached to a Galaxy A71 5G or Motorola Moto G Pure device. Based on my training and experience, okswtzv2 was attempting to gain access to FELERSKI's Google account by performing a password reset. However, to do this, okswtzv2 would need access to either the Galaxy A71 5G or Motorola Moto G Pure devices that were attached to FELERSKI's Google Account.

17. Discord User MamaDawnn responded to this okswtzv2 posting by saying "I know where that phone give me a minute", "Did you just send that?", "I might be able to get someone to open that phone." Okswtzv2 messaged "IF WE GET INTO THAT PHONE" and "WE CAN HIJACK HER TWITTER". Based on this it is information, DAWNN WALTERS had knowledge that the compromise of FELERSKI's email would lead to cyberstalking and harassment which is a violation of Title 18, United States Code, Section 2261A. MamaDawnn then messaged "Hold please." and; "No sim." In my training and experience, MamaDawnn stated that she was familiar with the location of one of the phones described and had someone that can access it. Based on DAWNN WALTERS' relationship with FELERSKI, vis-à-vis her son, it is likely that DAWNN WALTERS had access to FELERSKI and her phone. Additionally, in the text above, I assess that once DAWNN WALTERS, or an accomplice that DAWNN WALTERS directed, accessed FELERSKI's phone, she confirmed there was no SIM in the phone. A SIM<sup>4</sup> card was required for the phone

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<sup>4</sup> SIM card is a type of smart card that is physically inserted into a cellular phone and authenticates a cellular subscriber's device to their cellular account held by the provider.

to access the internet through a cellular network but a phone could still have accessed the internet through a Wi-Fi connection.

18. MamaDawnn then told okswtzv2 to “Try again. In her phone.” And “Need to get to the Google sign in before she gets to it. Be fast.” Okswtzv2 posted another Google account recovery screenshot to the Discord conversation to which MamaDawnn replied “Done.” Okswtzv2 messaged “WE ARE IN LOL.” and included a screenshot of the internal profile page for the account cassfelersk2000@gmail.com at approximately 8:50 PM<sup>5</sup>, which matched the screenshot posted by X User okswtz in Paragraph 11. Based on my training and experience and the context of this conversation, DAWNN WALTERS was accessing a computer or mobile device owned by FELERKSI that was connected to the internet to provide a two-factor authentication code to okswtzv2. Based on my training and experience, a cellular telephone connected to the internet is a “protected computer” as defined in 18 U.S.C. § 1030(e)(2)(B).

19. Later in the Discord conversation, MamaDawnn stated “I’m Payton’s mom.”, to which the Discord User “esexually” responded with “whos Payton” and MamaDawnn replied with “Niiko.” Niiko is the abbreviation for Payton Walters’ online Twitter account and persona, @NiikoTsuVT.

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<sup>5</sup> WITNESS 1 resided in the Eastern Time Zone.

20. MamaDawnn further requested, “I want hard proof she did the dox and hard proof she logged into his account and said those things.” to which Discord User esexually replied, “how did you get hands on her previous device”. MamaDawnn posted “She is sitting in a hospital bed. With a 1:1 losing her ducking mind.” and “Well, she left it at my kid’s house. I guess it’s his now.” Discord User esexually asked “is that her main device”, referring to FELERSKI’s phone that MamaDawnn’s son had, to which MamaDawnn replied “No, he main device is at the hospital with her.”

21. On October 9, 2023, Google responded to a court order for transactional records for the Google Account cassfelersk2000@gmail.com, which showed the account had two linked Android devices: A Samsung SM-A716U and a Motorola Moto G Pure. On September 4, 2023 at 23:41:12 UTC (7:41:12 PM Eastern), the Samsung SM-A716U device accessed the Google Account from an IP address registered to Unity Health System. On September 5, 2023 at 00:51:04 UTC (8:51:04 PM Eastern) the Motorola Moto G Pure had activity with Gmail from a Rochester-based IP address. Shortly afterward at 00:51:11 UTC the account was accessed from an IP address associated with the Mullvad VPN service. Based on my investigation of this case, Okswtz used the Mullvad VPN service<sup>6</sup> and had recommended it to other Discord users.

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<sup>6</sup> Specifically, this investigation revealed that Discord user Okswtzv2 accessed Discord using a Mullvad VPN IP address.

22. On September 19, 2023, the Orleans County Sheriff Investigator told FBI Buffalo that FELERSKI was at Unity Hospital in Rochester, New York from about August 31, 2023 until September 6, 2023. DAWNN WALTERS previously worked at Unity Hospital and was on the list of authorized visitors for FELERSKI between August 31, 2023 and September 6, 2023.

23. On September 14, 2023, after FELERSKI's Google account was compromised by DAWNN WALTERS and Discord user Okswtzv2, the Orleans County Sheriff Investigator notified FBI Buffalo that multiple Monroe County Legislators and New York State Assembly Members had received an email message from [cassfelersk2000@gmail.com](mailto:cassfelersk2000@gmail.com). The email message included FELERSKI's name, FELERSKI's telephone number and photographs of deceased children. Email messages sent to the New York State Assembly Members further included the threat to "shoot up some schools in new york". The Orleans County Sheriff Investigator told FBI Buffalo that they had talked to FELERSKI's mother who confirmed [cassfelersk2000@gmail.com](mailto:cassfelersk2000@gmail.com) belonged to FELERSKI. The Orleans County Sheriff Investigator had talked with FELERSKI the day prior on September 13, 2023 who told the Investigator that their email account had been hacked.

24. On September 22, 2023, the Honorable H. Kenneth Schroeder, Jr., Magistrate Judge for the Western District of New York, signed a search warrant that included the Discord User MamaDawnn (Discord User ID: 979182039922274304). Discord initially responded that it could not locate the account MamaDawnn but provided records for Discord

User “im\_the\_mom#0.” The user account “im\_the\_mom#0” is the same account as MamaDawnn, with the same Discord ID; however, MamaDawnn changed her username to “im\_the\_mom#0.”

25. Discord records for the Discord User “im\_the\_mom#0” included a telephone number known to be associated with DAWNN WALTERS and transactional records that showed the account was accessed from an iPhone 13 Pro Max and participated in the Discord Servers “AKUMA SHAKER CENTRAL [FASCIST LAND]” and “Walters Family”.

26. On October 10, 2023, the Monroe County Sheriff’s Office informed FBI Buffalo that Payton Walters told the Sheriff’s Office that FELERSKI was a video game streamer on Twitch<sup>7</sup> with a following of approximately 45,000 people. Payton Walters also told the Sheriff’s Office that on September 4, 2023, at Unity Hospital, he had told FELERSKI that FELERSKI had a deadline to leave his residence because they had broken up.

### **CONCLUSION**

27. Based on the foregoing, I respectfully submit that there is probable cause to believe that DAWNN MARIE WALTERS did violate of Title 18, United States Code, Sections 1030(a)(2)(C) (unauthorized access of a protected computer in furtherance of any criminal act in violation of the Constitution) and 371 (Conspiracy to commit offense).

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<sup>7</sup> Twitch.tv is a video live streaming service operated by Twitch Interactive that focuses on video game live streaming, including broadcasts of esports competitions.

Specifically DAWNN MARIE WALTERS conspired with Discord user Okswtzv2 to intentionally access FELERSKI's e-mail account to obtain information from a protected computer. This unlawful access was in furtherance of another federal crime, specifically, cyberstalking in violation of Title 18, United States Code, Section 2261A(2)(B). I respectfully request that the Court issue the attached criminal complaint, as well as an arrest warrant. To allow the warrant to be effectuated, I respectfully request that the criminal complaint, this affidavit, and the arrest warrant remain under seal.

Respectfully submitted,



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Joseph Naylor  
Special Agent  
Federal Bureau of Investigation

Signed electronically and sworn to telephonically  
on November 3, 2023

  
HONORABLE. MARIAN W. PAYSON  
STATES MAGISTRATE JUDGE